

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MONIQUE SYKES, REA VEERABADREN, KELVIN  
PEREZ, and CLIFTON ARMOOGAM, individually and on  
behalf of all others similarly situated,

Plaintiffs,

- against -

MEL S. HARRIS AND ASSOCIATES LLC; MEL S.  
HARRIS; MICHAEL YOUNG; DAVID WALDMAN;  
KERRY LUTZ; TODD FABACHER; MEL HARRIS  
JOHN/JANE DOES 1-20; LEUCADIA NATIONAL  
CORPORATION; L-CREDIT, LLC; LR CREDIT, LLC; LR  
CREDIT 10, LLC; LR CREDIT 14, LLC; LR CREDIT 18,  
LLC; LR CREDIT 21, LLC; JOSEPH A. ORLANDO;  
PHILIP M. CANNELLA; LR CREDIT JOHN/JANE DOES  
1-20; SAMSERV, INC.; WILLIAM MLOTOK; BENJAMIN  
LAMB; MICHAEL MOSQUERA; JOHN ANDINO; and  
SAMSERV JOHN/JANE DOES 1-20,

Defendants.

ECF Case  
No. 09 Civ. 8486(DC)

**MEMORANDUM OF LAW IN FURTHER SUPPORT OF PLAINTIFFS'  
MOTION FOR CLASS CERTIFICATION**

EMERY CELLI BRINCKERHOFF &  
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